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BILLINGS DIV.
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ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MONTANA

BILLINGS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM ESLEY HUGS, SR.,
WILLIAM ESLEY HUGS, JR.,
HARVEY ALLEN HUGS, and
MARC J. LITTLE LIGHT,

Defendant.

CR 11-55 -BLG- RFc

INDICTMENT

CONSPIRACY TO TRAFFIC IN
EAGLES AND MIGRATORY
BIRDS

(Count I)

Title 18 U.S.C. § 371

(Penalty: Five years
imprisonment, \$250,000 fine,
and three years supervised
release)

	UNLAWFULLY TRAFFICKING IN EAGLES (Counts II, VI, VII, VIII, & X) Title 16 U.S.C. § 668(a) (Penalty: one year imprisonment, \$5,000 fine first offense; two years imprisonment, \$10,000 for each subsequent conviction, one year supervised release)
	UNLAWFULLY TRAFFICKING IN MIGRATORY BIRDS (Counts III-V & IX) Title 16 U.S.C. § 703(a), 707(b) (Penalty: Two years imprisonment, \$2,000 fine, and one year supervised release)

THE GRAND JURY CHARGES:

COUNT I

That on or around December 5, 2010, through February 2011, at or near Hardin, in the State and District of Montana, the defendants, WILLIAM ESLEY HUGS, SR., WILLIAM ESLEY HUGS, JR., MARC LITTLE LIGHT, and HARVEY ALLEN HUGS, knowingly and willfully conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury, to kill, transport, offer for sale, and sell migratory birds, including bald and golden

eagles, in violation of 16 U.S.C. §§ 668(a), 703(a), & 707(b).

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendants, WILLIAM ESLEY HUGS, SR., WILLIAM ESLEY HUGS, JR., MARC J. LITTLE LIGHT, and HARVEY ALLEN HUGS, committed the following overt acts, among others, at or near Hardin, in the State and District of Montana, and elsewhere:

- (a) On or about December 5, 2010, HARVEY ALLEN HUGS, spoke with his brother, WILLIAM ESLEY HUGS, SR., and provided him with the mobile phone number of a person that had told HARVEY ALLEN HUGS, they wanted to buy eagle feathers.
- (b) WILLIAM ESLEY HUGS, SR., then called the buyer and arranged a meeting. At and subsequent to that meeting, the following transactions occurred:
 - 1. On December 5, 2010, WILLIAM ESLEY HUGS, SR. offered for sale, and sold, eagle plume feathers;
 - 2. On December 5, 2010, WILLIAM ESLEY HUGS, SR. offered for sale, and sold, three golden eagle wings;

3. On December 5, 2010, WILLIAM ESLEY HUGS, JR. offered for sale, and sold, two golden eagle wings;
4. On December 5, 2010, WILLIAM ESLEY HUGS, SR. offered for sale, and sold, a golden eagle tail;
5. On December 5, 2010, WILLIAM ESLEY HUGS, JR. offered for sale, and sold, five hawk tails;
6. On December 5, 2010, MARC J. LITTLE LIGHT offered for sale, and sold, 20 eagle bones;
7. On December 6, WILLIAM ESLEY HUGS, SR. offered for sale, and sold, two hawk tails.
8. On December 6, 2010, HARVEY ALLEN HUGS, demanded payment from the person that bought the eagle and hawk parts, in return for putting him in touch with the suppliers.
9. On or about December 23, 2010, WILLIAM ESLEY HUGS, SR. offered for sale, and sold, two golden eagle wings, and a golden eagle tail.
10. On or about January 12, 2011, WILLIAM ESLEY HUGS, SR. offered for sale, and sold, two bald eagle

wings, and a bald eagle tail.

11. On or about January 14, 2011, WILLIAM ESLEY HUGS, JR. offered for sale, and sold, a bald eagle tail and wings.
12. On or around February 19, 2011, WILLIAM ESLEY HUGS, JR. offered to sell a hawk tail.
13. On or around February 20, 2011, WILLIAM ESLEY HUGS, SR. and WILLIAM ESLEY HUGS, JR. offered for sale, and sold, a whole carcass golden eagle, multiple bald eagle wings, and a bald eagle tail.

All in violation of 18 U.S.C. § 371.

COUNT II

That on or around December 5, 2010, at or near Hardin, in the State and District of Montana, the defendant, WILLIAM ESLEY HUGS, SR., did knowingly, and with wanton disregard for the consequences of his actions, offer for sale, and sell, eagle parts, namely eagle plume feathers, three golden eagle wings, and a golden eagle tail, in violation of 16 U.S.C. § 668(a).

COUNT III

That on or around December 5, 2010, at or near Hardin, in the State and District of Montana, the defendant, WILLIAM ESLEY HUGS, JR., did offer for sale, and sell, parts of a migratory bird, namely two golden eagle wings and five hawk tails, in violation of 16 U.S.C. §§ 703(a) and 707(b).

COUNT IV

That on or about December 5, 2010, at Hardin, in the State and District of Montana, the defendant, MARC JASON LITTLE LIGHT, did offer for sale, and sell, parts of a migratory bird, namely 20 eagle bones, in violation of 16 U.S.C. §§ 703(a) and 707(b).

COUNT V

That on or about December 6, 2010, at or near Hardin, in the State and District of Montana, the defendant, WILLIAM ESLEY HUGS, SR., did offer for sale, and sell, parts of a migratory bird, namely two hawk tails, in violation of 16 U.S.C. §§ 703(a) and 707(b).

COUNT VI

That on or around December 23, 2010, at or near Hardin, in the State and District of Montana, the defendant, WILLIAM ESLEY

HUGS, SR., did knowingly, and with wanton disregard for the consequences of his actions, offer for sale, and sell, eagle parts, namely two golden eagle wings, and a golden eagle tail, in violation of 16 U.S.C. § 668(a).

COUNT VII

That on or around January 12, 2011, at or near Hardin, in the State and District of Montana, the defendant, WILLIAM ESLEY HUGS, SR., did knowingly, and with wanton disregard for the consequences of his actions, offer for sale, and sell, eagle parts, namely, two bald eagle wings, and a bald eagle tail, in violation of 16 U.S.C. § 668(a).

COUNT VIII

That on or about January 14, 2011, at or near Hardin, in the State and District of Montana, the defendant, WILLIAM ESLEY HUGS, JR., did knowingly, and with wanton disregard for the consequences of his actions, offer for sale, and sell, eagle parts, namely a bald eagle tail and wings, in violation of 16 U.S.C. § 668(a).

COUNT IX

That on or around February 19, 2011, at or near Billings, in the

State and District of Montana, the defendant, WILLIAM ESLEY HUGS, JR., did offer for sale, deliver for transportation, transport, and cause to be transported, parts of a migratory bird, namely a hawk tail, in violation of 16 U.S.C. §§ 703(a) and 707(b).

COUNT X

That on or around February 20, 2011, at or near Hardin, in the State and District of Montana, the defendants, WILLIAM ESLEY HUGS, SR. and WILLIAM ESLEY HUGS, JR., did knowingly, or with wanton disregard for the consequences of their actions, offer for sale, and sell, eagle parts, namely a whole carcass golden eagle, multiple bald eagle wings, and a bald eagle tail, in violation of 16 U.S.C. § 668(a).

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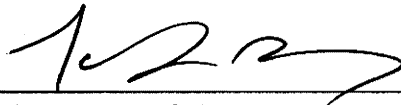
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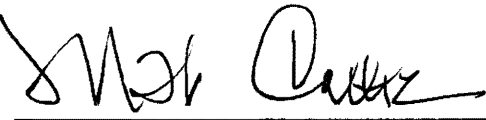
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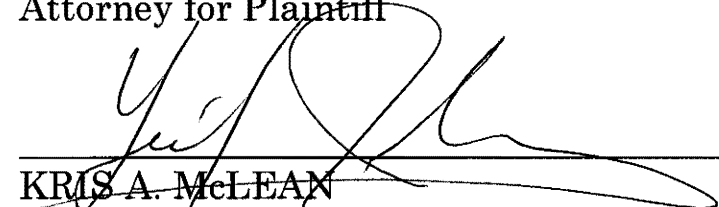
A TRUE BILL.



FOREPERSON



MICHAEL W. COTTER
United States Attorney
Attorney for Plaintiff

for 

KRIS A. McLEAN
Criminal Chief Assistant U.S. Attorney
Attorney for Plaintiff

Crim. Summons ☒
Warrant: ☒
Bail: none

Warrants- Hugs SR., Hugs JR.
Summons - Harvey, Little Light

Return:

6/23/11 @ 2:00pm
Judge Ostby / BLS